

The Honorable Robert S Lasnik

JAMES MCDONALD
14840 119th PL NE
Kirkland, WA 98034
Phone (425) 210-0614
In Pro Per

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re:)	NO.: C10-1952RSL
)	
JAMES MCDONALD)	
Plaintiff)	
v)	Plaintiff's Initial Disclosures
ONEWEST BANK, FSB, <i>et al.</i> ,)	
Defendants.)	
)	

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff James McDonald hereby makes his initial disclosures to the Defendants as follows:

RESERVATION OF RIGHTS

1. Plaintiff's disclosures are based upon information reasonably available to him as of the date these disclosures are prepared. Accordingly, Plaintiff reserves the right to supplement the information contained herein if additional information becomes known to him at a later date.
2. Plaintiff's initial disclosures are not intended to and do not constitute a waiver of any objections he may have now or in the future to any discovery in this action. Plaintiff expressly reserve any and all objections which he has, previously had, or may ever have, including, but not limited to, objections based upon relevance; attorney-client privilege; attorney work-product doctrine; undue burden or harassment; overbreadth; immateriality; or any other applicable privilege or protection under federal, local or applicable state laws or rules of evidence.
3. Plaintiff expressly reserves the right to identify individuals or documents or call as witness individuals in addition to those listed herein, including witnesses disclosed by Defendants, and to identify additional documents, if Plaintiff discovers additional documents exist that

Plaintiff's Initial Disclosures

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are relevant to this action or that such individuals have or might have knowledge of matters relevant to this case.

4. Any of all these initial disclosures are made subject to and without limiting any of the forgoing reservation of rights.

I. Individuals likely to have discoverable information that may be used by Plaintiff to support his claims or defenses:

Subject to and without waiving reservation of rights stated above and based upon the information reasonably available to Plaintiff at the present time, Plaintiff identifies the following as individuals likely to have discoverable information that Plaintiff may use to support his claims or defenses:

1. Plaintiff James McDonald, 14840 119th PL NE, Kirkland, WA 98034; (425) 210-0614.
2. Representative(s) for Defendant OneWest Bank FSB, c/o Attorney Heidi Buck, 13555 SE 36th St, Suite 300, Bellevue, WA 98006. (425) 458-2121.
3. Representative(s) for Defendant MERS, c/o Attorney Heidi Buck, 13555 SE 36th St, Suite 300, Bellevue, WA 98006. (425) 458-2121.
4. Representative(s) for Defendant Northwest Trustee Services, c/o Attorney Heidi Buck, 13555 SE 36th St, Suite 300, Bellevue, WA 98006. (425) 458-2121.
5. Representative(s) of the Security Exchange Commission, Office of Inspector General, 100 F Street NE, Washington, DC 20549-2736.
6. All individuals identified in the proceedings as having taken part in any or all activities associated with the case and claims at hand.

II. Description of Documents, data compilations, and tangible things that are in Plaintiff's possession, custody, or control that may be used to support his claims or defenses

Subject to and without waiving the reservation of rights stated above and based upon the information reasonably available to Plaintiff at the present time, Plaintiff submits the following description of documents, data compilations, and tangible things in his possession, custody, or control that may be relevant to his claims or defenses. Plaintiff is also identifying documents which he knows to exist and which he believes may support his complaints:

1. All written correspondence between Plaintiff and Defendants including but not limited to collection activities, debt validation demands and disputes and responses thereto.
2. All posted public records relating to the loan in question.

III. Damages Computation

A computation of the categories of damages claimed by the Plaintiff as follows:

- #### IV. Insurance

/s/James McDonald-
James McDonald
Pro Se